

DECLARATION OF BENJAMIN VAFAI
Pursuant to 28 U.S.C. § 1746

I, Benjamin Vafai, have personal knowledge of the facts and matters set forth below. If called as a witness, I could and would testify as follows:

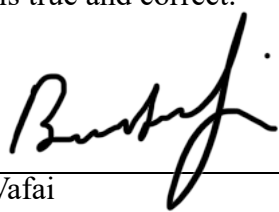
1. My name is Benjamin Vafai. I am over the age of 18 and reside in Trabuco Canyon, California.
2. In approximately June 2023, I searched online for a way to make additional income through e-commerce stores. I had experience running my own third-party Amazon store for approximately two years, but I was looking for a company to run a store for me. I found a company that could run a third-party seller store on Amazon and Walmart called the FBA Machine. I spoke with a salesperson named Roman Sterling.
3. During our conversations, Roman showed me a spreadsheet that showed the amount of money a third-party e-commerce store could make in revenue and profit. Roman told me that my store could generate \$10,000 per month in revenue selling on Amazon.
4. FBA Machine charged \$12,000 for its services. The company would completely manage an Amazon or Walmart e-commerce store for me, and I would collect passive income from the store. Roman also told me that the initial fee was \$12,000, but I could earn that back within one year.
5. I paid \$10,000 with my credit card for one Amazon store and one Walmart store. This was supposed to be for all the work they were supposed to do for both stores. I was also told that the company would create a brand name for me.
6. I never received any document from FBA Machine with any information substantiating their earning and profit claims contained in their profit calculator or over the phone with the sales agent. I also never received a document from FBA Machine telling me whether

the company (or any associated companies) has been subject to legal action or a list of consumers who purchased their services in the past 3 years.

7. Steven, the CEO of FBA Machine, told me he would open a Walmart store for me, and as far as I know, he never did. I went back and forth with Steven for about six months on this and he just told me that there were legal issues, but never gave me a straight answer.
8. My Amazon account was supposed to open within three months, but it took approximately six months. I had to open an account with KeHe to purchase groceries for my Amazon store, and I paid an additional \$6,000 in inventory. My Amazon store opened, but as far as I know, nothing was ever sold on my store. The inventory was shipped to a warehouse in New Jersey but never ended up in my store.
9. Because it took so long to open my Amazon store and nothing was sold on it and because FBA Machine never opened my Walmart store (thereby not honoring our agreement), I charged back the \$10,000 initial fee, and the bank refunded my money. FBA Machine also never created a brand name for me.
10. I then asked Steven for my inventory back, and he told me he would not return it because I charged back my initial fee.
11. I wanted to sue Steven for the \$6,000 in inventory, but I did not. I still have not received my inventory from Steven or the \$6,000.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 06.19, 2024
Trabuco Canyon, California


Benjamin Vafai